

Department of Energy

Oak Ridge Operations Paducah Site Office P.O. Box 1410 Paducah, KY 42001

January 17, 2002

Mr. Mark Donham Chairman, PGDP Citizens Advisory Board 111 Memorial Drive Paducah, KY 42001

Dear Mr. Donham:

DEPARTMENT OF ENERGY RESPONSE TO THE PADUCAH GASEOUS DIFFUSION PLANT CITIZENS ADVISORY BOARD RECOMMENDATION 01-4

The Department of Energy (DOE) has evaluated the Citizens Advisory Board (CAB) recommendation regarding seismic study work at Barnes Creek in Southern Illinois. The recommendation asks "that work proceed with hand tools only, and that before heavy equipment is used to dig into the face of Barnes Creek, a DOE representative will explain to the board, or its Waste Operations Task Force, the necessity for such an action."

DOE acknowledges the concerns raised (Enclosure) at the November meeting resulting in this recommendation but respectfully declines your recommendation.

The DOE has spent many months working on plans to investigate the feasibility of constructing a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) waste disposal facility in Paducah. For the past 12 months, DOE has been diligent in sharing that information with the CAB.

DOE will make a reasonable effort to refrain from the use of heavy equipment in the creek bank. However, this work decision must and will be made in the field. There is no seeable value to further delaying these activities, which have been appropriately planned, scheduled, and approved by the responsible and knowledgeable parties.

The characterization plans, developed to assist DOE and the Regulatory parties in determining the viability of a CERCLA waste disposal facility at the Paducah Site, have been communicated to the public via information briefings at the CAB meetings (four since January 2001), weekly updates to the CAB membership, newsletter articles, and meetings with state and federal regulators. Because the CAB has been thoroughly briefed on this planned work and the important role it will play in reaching this decision, very little additional value would result from further study and discussion on the seismic assessment plan at the creek site. The potentially negative consequence

of deferring a decision that is most appropriately made in the field until additional discussions could be held within the advisory board or one of its tasks forces would not be a responsible act by DOE.

Thus, the planned and approved seismic assessment study at Barnes Creek will continue as planned with care taken to not disturb the site any more than necessary. To ensure that all those involved in the actual site field work are aware of the Board's expressed concern, we are distributing to them copies of this letter and enclosure.

Sincerely,

W. Don Seaborg, Site Manager

Paducah Site Office

Enclosure

cc w/enclosure:

D. W. Dollins, EM-98

G. L. Dover, BJC/Kevil

C. Froede, EPA/Atlanta

L. Martin, KDEP/Frankfort

J. W. Nelson, ISGS/Champaign

J. Skridulis, BJC/Kevil



PADUCAH GASEOUS DIFFUSION PLANT CITIZENS ADVISORY BOARD

111 memorial Drive • Paducah, Kentucky 42001 • (270) 544-3004 • padssab@apex.net • www.oakridge.doe.gov/pgdpssab

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Deputy Designated Federal Official

W. Don Seaborg, DOE Ex-officio member

Ex Officio Members

Carl Froede, Jr. Environmental Protection Agency

Jim Lane Jr.
Fish and Wildlife Resources
(Kentucky)

Tuss Taylor Division of Waste Management (Kentucky)

John A. Volpe, Ph.D. Radiation Control Branch (Kentucky)

DOE Federal Coordinator Patricia J. Halsey

Additional information about contacting board members directly can be obtained from the CAB web site or by contacting Jill Holder at (270) 554-3004.

Paducah Gaseous Diffusion Plant Citizens Advisory Board Consensus Recommendation

DATE: December 7, 2001

NUMBER: 01-4

RESPONSE REQUESTED BY: January 7,

REGARDING: Seismic Study Field Work at

Barnes Creek in Southern Illinois

TO: W. Don Seaborg, DOE

CC: CAB members, Ex-officio Members

Background: As part of its seismic evaluation of the Paducah site as the site of a potential CERFCLA waste disposal facility, DOE is conducting field studies at a site along Barnes Creek in Southern Illinois. This study calls for surveying the creek for evidence of historic fault activity and could call for the use of heavy equipment to dig into the creek bank. The PGDP CAB was read a letter from seven environmental groups that expressed concern that the use of heavy equipment could damage the creek bank, plant and animal life in the area.

The board concurred that the use of heavy equipment could be detrimental to the creek's environment and determined that there were alternatives to digging into the bank of the creek with heavy equipment. The board then passed the following recommendation without dissent:

CONSENSUS RECOMMENDATION:

The Paducah Gaseous Diffusion Plant Citizens Advisory Board is concerned that the use of heavy equipment in a seismic study of Barnes Creek in Southern Illinois would be destructive to the creek. The board recommends that work proceed with hand tools only, and that before heavy equipment is used to dig into the face of Barnes Creek, a DOE representative will explain to the board, or its Waste Operations Task Force, the necessity for such an action.

Submitted, Dec. 7, 2001 Paducah Gaseous Diffusion Plant Citizens Advisory Board Mark Donham, Chair